

November 28, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: Compliance Letter of Vonage America Inc.; WC Docket No. 05-196

Dear Ms. Dortch:

Vonage America Inc. (“Vonage”) submits this Compliance Letter to advise the Commission of the status of Vonage’s compliance with the Commission’s E911 rules. Vonage is the largest provider of nomadic, interconnected VoIP information services in the United States. Vonage has undertaken painstaking efforts to develop and acquire the systems, capabilities, methods, and procedures needed to provide E911 services nationwide in a fully nomadic environment. As of today, the Commission, and Vonage, are on track to achieve the fastest nomadic E911 deployment yet.

To date, Vonage has invested over \$50 million in its E911 deployment and has 125 people working on its E911 compliance project. The Vonage E911 system is national in scope and functionality. As of November 28, 2005, Vonage is capable of transmitting ANI and Registered Location information for 100% of its subscriber lines and has established connectivity to selective routers for more than 90% of those lines. Vonage can today transmit ANI and Registered Location information for over 90% of its subscriber lines to the public safety answering point (“PSAP”), a designated statewide default answering point, or appropriate local emergency authority in accordance with Section 9.5 of the Rules. Accordingly, as of this filing Vonage is delivering where possible all 911 calls to the Wireline E911 Network. Vonage is now delivering E911 calls to 746 VoIP E911 ready and capable PSAPs (“Capable PSAPs”). Approximately 26% of Vonage’s customer lines have the benefit of E911 call delivery to Capable PSAPs as of November 28, 2005. At the end of December, approximately 61% of Vonage’s subscriber lines will have the benefit of call delivery to Capable PSAPs; this will increase to more than 97% of Vonage’s subscriber lines in the first half of 2006.¹

¹ Vonage believes it can achieve these numbers subject to the following conditions being met: (1) a p-ANI administrator is appointed prior to the end of the year; (2) ILECs and PSAPs provide Vonage access to the third party elements necessary to test and steer E911 calls; and (3) ILECs and PSAPs integral to E911 call delivery become VoIP E911 capable and fully cooperate with Vonage to test call delivery.

As Vonage's experience in Verizon territory demonstrates, with full incumbent local exchange carrier ("ILEC") and PSAP cooperation, Vonage can rapidly complete the full deployment of an E911 network. Due in large part to Verizon's cooperation and leadership from public safety officials, nearly all of the Capable PSAPs receiving ANI and Registered Location for Vonage's customers' E911 calls as of November 28, 2005 are located within Verizon's ILEC service territory.

Vonage is working closely with PSAPs and Vonage has, either directly or indirectly through one of its third-party vendors, visited, or spoken via telephone with PSAP representatives in all 50 States, Puerto Rico and the District of Columbia. Vonage has also worked closely with the major ILECs, even prior to the issuance of the Order,² to obtain access to the ILEC elements necessary to route E911 calls. Vonage has expended substantial efforts to enhance the robustness of its E911 solution beyond what is technically required in the Order, including for example, deploying TTY functionality for E911. As an information service provider, Vonage will continue to work with the Commission and the public safety community to harness the power of the Internet to deliver additional information and capabilities, beyond ALI and Registered Location, to PSAPs. The Vonage solution represents a marriage of the innovative approaches of VoIP with the legacy requirements of the native 911 system, supported by extensive public safety outreach and new agreements and service offerings from third party providers. An illustration of the call flow in Vonage's E911 solution is provided in Exhibit 1.

Because Vonage is a service provider with over one million lines, and because many of its customers use its service nomadically, Vonage must deploy its E911 solution nationwide. The scale and scope of this effort are enormous and have never been attempted in such a compressed timeframe prior to the FCC's Order. During this project, Vonage found that there were few resources available to guide it in its nationwide deployment of E911 service. For example, until November 18, 2005,³ there was no comprehensive list of all of the selective routers in the United States and no comprehensive list of which PSAPs are connected to which selective routers. In fact, in Vonage's experience, sometimes PSAP personnel cannot identify the selective router to which their PSAP is connected. Vonage therefore has had to carefully and painstakingly compile the information necessary to map its customers to PSAP boundaries (which some PSAPs changed for purposes of accepting VoIP calls), map the PSAPs to selective routers, and build from scratch the processes and procedures necessary to coordinate, test, and implement an E911 solution for Vonage's customers.

Notwithstanding these obstacles, Vonage has designed and deployed an E911 solution to serve its nomadic customers. While Vonage can today transmit ANI and Registered Location information for over 90% of its subscriber lines to the PSAP, a designated statewide default

² *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (rel. June 3, 2005) ("Order").

³ Although the 9-1-1 System Reference Guide recently released by NENA allows a qualified user to view, on a subscription basis, limited data on Selective Routers and associated PSAPs, it does not include any information usable for direct 9-1-1 call routing. See NENA Announces Availability of New Resource to Support FCC-Compliant 9-1-1 Interconnection (Nov. 28, 2005), available at <http://www.nena.org/911rdb/9-1-1%20System%20Reference%20Guide%20Release-3.pdf>.

answering point, or appropriate local emergency authority, many PSAPs are not yet capable of receiving VoIP E911 calls. Vonage believes that the number of Capable PSAPs could be dramatically increased by the first half of 2006 if the following conditions are met: (1) a p-ANI administrator is appointed prior to the end of the year; (2) ILECs and PSAPs provide Vonage access to the third party elements necessary to test and steer E911 calls; and (3) ILECs and PSAPs integral to E911 call delivery become VoIP E911 capable and fully cooperate with Vonage to test call delivery.

As required by the Public Notice issued by the Commission's Enforcement Bureau on November 7, 2005 ("Public Notice"),⁴ Vonage responds to the following specific questions:⁵

1) **Vonage's 911 Solution**

The first and most important component of Vonage's solution is establishing interconnection, directly or indirectly, with the selective routers that serve its customers. As of the date of this report, Vonage is able to deliver VoIP E911 calls it receives from more than 90% of its subscriber lines to the customer's correct selective router for routing to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority. When Vonage has completed its initial implementation of E911 service in the first half of 2006, it will have established interconnection to selective routers serving over 95% of its subscriber lines. However, nationwide E911 deployment is not static. As Vonage adds new customers and existing customers update their Registered Locations, Vonage will continue to assess the need to add selective routers. Vonage has put in place the methods, procedures, and operations necessary to continually monitor its subscribers and determine where, when, and how it must supplement its solution, including adding connectivity to additional selective routers.

- a) **911 Routing Information/Connectivity to Wireline E911 Network: Statement as to whether Vonage is transmitting, as specified in Paragraph 42 of the VoIP 911 Order, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."**

RESPONSE: As of November 28, 2005, Vonage is capable of transmitting ANI and Registered Location information for 100% of its subscriber lines and has established connectivity to selective routers for more than 90% of those lines. Vonage can today transmit ANI and Registered

⁴ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 & 05-196 (Nov. 7, 2005).

⁵ Vonage previously filed Subscriber Acknowledgement Reports on August 10, September 1 and September 22 of this year describing Vonage's extensive efforts to comply with the Commission's affirmative acknowledgment requirements set forth under Rule 9.5(e). To date, Vonage has obtained affirmative acknowledgment from more than 99% of its subscriber base. Vonage's efforts to obtain affirmative acknowledgment from the remaining customers are on-going and the Company will provide notice once 100% compliance has been reached in accordance with the Enforcement Bureau's August 26, 2005 Public Notice.

Location information for over 90% of its subscriber lines to the PSAP, a designated statewide default answering point, or appropriate local emergency authority. Accordingly, as of this filing Vonage is delivering where possible all 911 calls to the Wireline E911 Network. Vonage is now delivering E911 calls to 746 Capable PSAPs. Approximately 26% of Vonage's customer lines have the benefit of E911 call delivery to Capable PSAPs as of November 28, 2005.

As of the date of this report, Vonage has successfully established connectivity to approximately 320 selective routers that serve more than 90% of its subscriber lines. At the end of its initial implementation phase in the first half of 2006, Vonage will have established connectivity to approximately 400 selective routers that serve approximately 95% of its subscriber lines. Based on the commitments and representations of its third-party vendors, Vonage and/or one of its third-party providers has deployed its solution with approximately 746 Capable PSAPs – serving approximately 26% of the Company's subscriber lines. Given that the network to these selective routers is only recently deployed, and that testing requires PSAP cooperation and critical third-party inputs, Vonage is in the process of continuing to further test its system and coordinate with PSAPs. As described below, the lack of access to critical inputs, and/or lack of ILEC or PSAP readiness and capability, have hampered PSAPs' ability to live test VoIP E911 calls. As these third party resource constraints are removed, Vonage will complete further deployment to PSAPs as they become VoIP E911 capable.

- b) **Transmission of ANI and Registered Location Information: A detailed statement as to whether Vonage is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information.**

RESPONSE: Approximately 26% of Vonage's customer lines will have their ANI and Registered Location information transmitted to Capable PSAPs as of November 28, 2005. Although Vonage can today transmit ANI and Registered Location information for over 90% of its subscriber lines to the PSAP, a designated statewide default answering point, or appropriate local emergency authority in accordance with Section 9.5 of the Rules, due to lack of ILEC and PSAP readiness (such as where p-ANI has not been assigned or shell records have not been built by the ILEC), not all PSAPs are capable, at this time, of receiving the ANI and Registered Location information Vonage is capable of providing.

- c) **911 Coverage: To the extent a provider has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the provider should: 1) describe in detail, either in narrative form or by map, the areas of the country, on a MSA basis, where it is in full compliance and those in which it is not; and 2) describe in detail its plans for coming into full compliance with the requirements of the order, including its anticipated timeframe for such compliance.**

RESPONSE: Detailed information related to the areas of the country where Vonage has not established connectivity to the selective routers serving its customers is provided in Confidential Exhibit 2. Detailed information related to the areas of the country where the PSAPs serving Vonage's customers are VoIP E911 capable is provided in Exhibit 3. Because E911 service is

deployed on a PSAP by PSAP basis and the PSAP boundaries are not delineated by MSA, Vonage does not currently have the capability to provide MSA based information. Accordingly, the information provided is set forth by PSAP.

Despite its best efforts, Vonage's ability to deliver E911 calls to Capable PSAPs has been severely hampered not only by the lack of a VoIP E911 standard and centrally available information on the nation's E911 network, but also by the lack of access to inputs necessary to implement E911 service -- inputs that are beyond Vonage's control.⁶ First, Vonage has experienced substantial delays in obtaining p-ANI. The lack of any numbering administrator has resulted in complete p-ANI unavailability in many areas and in other areas, ILEC p-ANI assignment processes have developed slowly or not at all. Without p-ANI, E911 calls from Vonage's customers cannot be routed reliably to the correct PSAP.

Second, the lack of p-ANI has resulted in additional delays that affect the entire 911 system. Vonage has experienced significant delays from certain ILECs when attempting to obtain ILEC assistance in creating shell records for the PSAPs. Shell records contain the customer's true phone number and location information. A delay in shell record provisioning can impair a PSAP's ability to become VoIP E911 capable. Although this has not been a problem in Verizon territory, in most other areas, the ILECs have only very recently been willing to create the shell records and, in many instances, including all of BellSouth territory, there has been no progress in the creation of shell records at all.

Third, even in those areas where Vonage has received both p-ANIs and shell records, many PSAPs have not been available for testing due to resource and other administrative constraints which have delayed or prevented their ability to receive the information Vonage is capable of transmitting.

Lastly, while Vonage has forged ahead in a nationwide E911 deployment, the same has not been true in regards to our counterparts in public safety. National VoIP E911 standards have been delayed or not yet released. Confusion reigns in the vast majority of the nation's PSAPs in regards to VoIP E911 deployment and national standards.

As discussed in more detail above, while Vonage has delivered on all of the inputs it can self provision and in partnership with its third party vendors (Level 3, TCS, and Intrado) developed and socialized a national VoIP E911 solution, Vonage cannot deliver 911 calls directly to PSAPs unless the PSAPs are capable of receiving that information. Accordingly, a complete E911 solution requires that Vonage and the public safety community both have access to certain critical elements. Vonage has undertaken extraordinary efforts to obtain those needed inputs, including extensive negotiations and interaction with ILECs, CLECs, database providers, and PSAPs.

⁶ See *Ex Parte* Letter from Jeffrey A. Citron, Vonage Chairman and CEO to Kevin J. Martin, Chairman, FCC, WC Docket Nos. 04-36 & 05-196 at 2-3 (filed Nov. 14, 2005).

Despite those obstacles, Vonage believes that at the end of December 2005, approximately 61% of Vonage's subscriber lines will have the benefit of E911 call delivery to Capable PSAPs; and that in the first half of 2006 more than 97% of Vonage's subscriber lines will have the benefit of E911 call delivery to Capable PSAPs subject to the following conditions being met: (1) a p-ANI administrator is appointed prior to the end of the year; (2) ILECs and PSAPs provide Vonage access to the third party elements necessary to test and steer E911 calls; and (3) ILECs and PSAPs integral to E911 call delivery become VoIP E911 capable and fully cooperate with Vonage to test call delivery.

2) **Obtaining Initial Registered Location Information: Actions Vonage has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location.**

RESPONSE: As of July 1, 2005, Vonage required that all new subscribers provide a Registered Location as part of the subscription process. The sign-up screen through which Registered Location information is collected is attached as Exhibit 4. With respect to existing customers, Vonage has long offered a Phase 0 911 service in accordance with the NENA recommended approach which required customers to provide their location. As a result, most of Vonage's customers have long had Registered Locations on file with the Company for the purposes of delivering 911 calls to the administrative line at the PSAP. For the remaining customers Vonage has collected billing and/or shipping information provided in connection with Vonage's delivery of the customer devices. To confirm that that information is correct, Vonage has made numerous attempts to contact all of those customers from whom it does not have a customer submitted Registered Location. Complete text of the correspondence, sent on October 26 and November 3, 8, and 10, 2005 to subscribers, is provided in Exhibit 5. Vonage has also called customers on an individual basis in those limited instances where the billing and shipping addresses do not appear to be a viable Registered Location (such as in the case of a P.O. box). To date, of the customers who had not self-provided Registered Location information as of late October, approximately 17% have responded to Vonage's communications to confirm their Registered Location. As of November 28, 2005, for those customers that have failed to respond, Vonage will use the address that was included in the third E-mail advisory as the customer's Registered Location to provision E911 services. Vonage will send an additional E-mail to those customers within the next ten days to confirm that the Registered Location address conversion has been completed and will follow-up with voicemail messages to any customers for whom the E-mails are returned as undeliverable. Vonage will continue to work to contact the remaining customers in order to confirm Registered Location information.

3) **Obtaining Updated Registered Location Information: Methods Vonage offers to its subscribers to update their Registered Locations.**

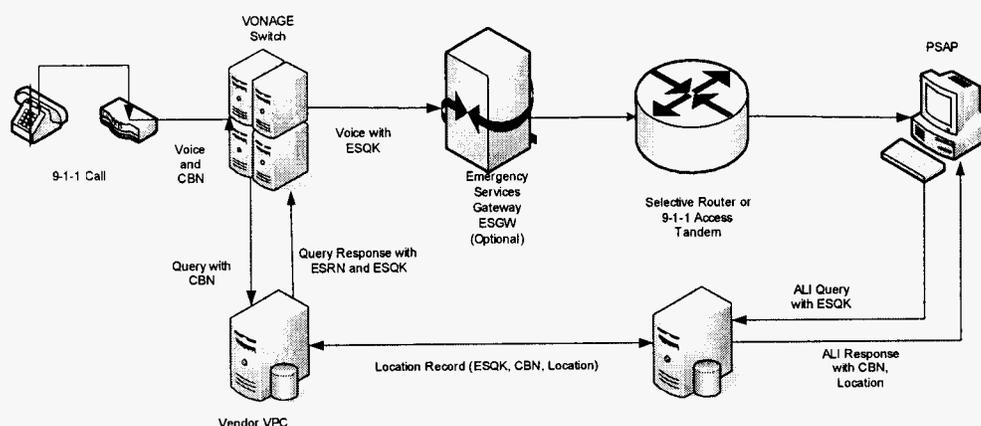
RESPONSE: Vonage allows Customers to update their Registered Location either through their web account or through Vonage's customer service department. The customer service department is available 24 hours a day, 7 days a week and allows Vonage subscribers to update their Registered Location using the same equipment they use to access their interconnected VoIP services. Further information regarding Vonage's processes for Registered Location update is provided in Exhibit 6.

EXHIBIT 1

Description – Enhanced 9-1-1

The functional components of the end-to-end VoIP E9-1-1 being implemented by Vonage follow the general direction of the NENA i2 proposed standard. Vonage is challenged to deliver service for callers that are nomadic in nature, in that the caller's location may change, or the caller's telephone number is not native to the local area. The solution allows for this nomadic condition and minimizes the changes required by the PSAP to receive calls.

Generally, at the time of the emergency call, Vonage places a query to the VoIP Positioning Center (VPC), which causes the VPC to provide routing instructions for the voice call, and to cause the delivery of the call back number and the caller's provided location to the PSAP.



**Enhanced 9-1-1 Call Flow
Diagram**
(Simplified)

Specifically, The following steps describe the general flow in the call delivery process:

- Vonage passes the caller's primary phone number (used as the Location Key or "LK") to the VPC.
- The VPC uses the LK to locate the caller's record, containing the Call Back Number (CBN), the caller's provided street address and a geographic key previously assigned for the location.
- The VPC compares the geographic key to the known PSAP boundary information, provided by the PSAP or obtained commercially.
- Based on the PSAP determination, the VPC looks up an Emergency Service Routing Number (ESRN) and an Emergency Service Query Key (ESQK).
- The ESRN and the ESQK are passed back to Vonage.
- Vonage uses the ESRN to determine the routing of the voice call, and routes the call to the proper Emergency Services Gateway (ESGW). Vonage also passes the ESRN and ESQK to the ESGW along with the voice call.

- The ESGW converts the VoIP SIP call to standard signaling formats, and uses the ESRN to place the call on a 9-1-1 trunk to the Selective router. The ESQK is transmitted to the selective router along with the voice call.
- The selective router determines the ESN associated with the ESQK, and routes the call to the proper PSAP.
- The PSAP queries the ALI using the ESQK to query the ALI database.
- The ALI database uses the ESQK to determine the proper ALI steering partner, and routes the request to the VPC.
- The VPC uses the ESQK to determine the caller location, CBN and associated response information, and returns the information to the PSAP.

EXHIBIT 2

TO BE FILED UNDER SEAL

EXHIBIT 3

[PROVIDED IN SEPARATE FILE]

Exhibit 4

Please Activate 911 Dialing:

To set up your Vonage 911 Dialing, please tell us below where you will be using your Vonage service.

* marked are required fields.

Address Where 911 Dialing Will Be Used				Do not enter a P.O. Box
*Street Number	*Street Name (e.g. Elm. Main)	*Street Suffix (e.g. Street, Road)	Address Line 2 (e.g. Suite 123, Apartment 2B)	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	
*City	*State ---select one---		*Zip Code	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	

Vonage is in the process of a nationwide rollout of Enhanced 911 (E911) service. While we have already rolled out E911 in certain areas of the country, it will take some time to fully roll out across the entire country, and we will notify you when we are able to offer E911 in your area.

In the meantime, Vonage currently offers a form of 911 that is similar to E911, but has some important differences. With Vonage's 911 Dialing service, Vonage uses the address you provide to determine the nearest emergency response center and then sends your call to a general number at that center. When the center receives your call, the call taker will not have your address and may not have your phone number on hand, thus you must provide that information in order to get help. Some local emergency response centers may decide not to have their general numbers manned by live operators 24 hours a day. If Vonage learns that this is the case, Vonage will send your call instead to a national emergency calling center and a trained agent will contact an emergency center near you to dispatch help.

Remember that Vonage's 911 Dialing service will not function in the event of a broadband or power outage or if your broadband, ISP or Vonage service is suspended or terminated. Also note that if you move your device you must reactivate 911 Dialing with your new address and if you add a line to your account you will need to activate 911 Dialing for that line as well. You will not be able to reach the emergency dispatch center until we confirm that your location has been registered or updated. This process can take several hours, and you will receive a confirmation email once 911 Dialing has been activated for your initial location or for a newly registered location.

By clicking "Continue", you confirm that you have read and understood how Vonage's 911 Dialing works.

{ Back }

{ Continue }

Free month offer is valid ONLY for the \$24.99 Unlimited Residential Plan. Not valid for \$14.99 residential or any business plans. Not included in monthly plan prices: broadband service charges, the service activation fee, regulatory recovery fee, taxes, shipping and handling charges. International calls are charged per minute. Directory assistance and other premium services are additional charge. Credit card required. With Free First Month offer, you will not be charged the cost of the \$24.99 plan, but other charges will apply. Offer valid in US only and cannot be combined with any other offer. Other restrictions may apply. Instant Rebate condition: If you cancel your Vonage service after the Money Back Guarantee period and within 90 days of activating service, your account will be charged for the remaining balance of the equipment. See Vonage's Terms of Service for details. We reserve the right to immediately terminate and/or modify your service and applicable charges if we determine, in our absolute discretion, that your use of the service and/or device indicates auto-dialing, continuous or extensive call forwarding, telemarketing, fax/voicemail broadcasting or fax/voicemail blasting. Vonage America Inc., a wholly owned subsidiary of Vonage Holdings Corp., provides our broadband telephone services. Vonage® and Vonage The Broadband Phone Company® are registered service marks owned by and used under license from Vonage Marketing Inc., a wholly owned subsidiary of Vonage Holdings Corp. Express written permission from Vonage Marketing Inc. is required to use any Vonage intellectual property.

EXHIBIT 5

E-mail 1 by Account –

The following email was sent to each OPT-OUT **account** to request that they log in to web account to provide a 9-1-1 address:

From: Customer Care
To: <customer name>
Subject: Activate Your 911 Dialing

Dear Valued Customer,

All VoIP providers are required by the FCC to provide 911 Dialing service to all of our customers. In addition to acknowledging our 911 Dialing notice, you must also provide us with the location information (street address) where you will using your Vonage service.

You can provide us your street address by simply logging in to your web account <Include link to online web account> , selecting the Features link on your dashboard, and filling out a short form with your street address in the 911 Dialing feature box. Once we have this information, your 911 Dialing will be available within a couple of hours.

Please note, if you have multiple phone lines you **MUST** provide us with the street address for each line separately in order to activate 911 Dialing. 911 calls are routed based on the street address you have registered with us, so if you move your device you must re-register your new street address. Also, if you add a line to your account you will need to activate 911 Dialing by providing us with your street address for that line as well. Remember, you can easily update your street address at any time through your web account.

At Vonage your safety is important to us, and we look forward to providing you with reliable broadband phone service.

Sincerely,
Vonage Customer Care

E-mail 2 – Including the DID - This email is sent to each Opt Out DID to request that they log in to web account to provide a 9-1-1 address; if the customer had multiple lines they then received multiple emails.

From: Customer Care

To: <customer name>

Subject: Activate 911 Dialing for Phone Number <Insert Number>

Dear Valued Customer,

All VoIP providers are required by the FCC to provide 911 Dialing service to all of our customers. You may have missed the recent emails requesting that you provide us with location information (street address) where you will be using your Vonage service so that we can activate your 911 Dialing.

We apologize for sending you repeated notifications, but we are required to have all of our customers activate 911 Dialing. In particular, we must activate 911 Dialing for your phone number <Insert phone number here>. **In addition, it is important to note that if you have multiple Vonage lines you must activate 911 Dialing for each line separately.**

Please immediately [login to your web account](#) <Include link to online web account> and select the Features link on your dashboard. You can provide us with your street address information from the 911 Dialing feature box.

Please note that 911 calls are routed based on the street address you have registered with us, so if you move your device you must re-register your new street address. Also, if you add a line to your account you will need to activate 911 Dialing by providing us with your street address for that line as well. Remember, you can easily update your street address at any time through your web account.

At Vonage your safety is important to us, and we look forward to providing you with reliable broadband phone service.

Sincerely,

Vonage Customer Care

E-mail 3 – Including DID and address – This is the final email sent to those Opted Out customers who have not responded to the previous ones sent. They're being shown the 911 address that will be populated in their account; we are also informing them that they are able to change the address by logging into their web account.

From: <Customer Care>

To: <customer name>

Subject: Activate 911 for Phone Number <Insert Number>

Dear <customer first name>,

We have sent numerous notifications prompting you to provide us with location information (street address) where you will be using your service. This information is required to activate your 911 Dialing service for phone number <Insert phone number>. As we have advised you, all VoIP operators are required by the FCC to provide 911 Dialing service to all of our customers.

Beginning November 18, we will use the following address to route your 911 calls unless you immediately login to your web account select the Features link on your dashboard, and insert your correct street address information in the 911 Dialing feature box:

<insert customer address>

VoiceMail: Voice Mail Draft Verbiage – This message is being deposited into those customer voicemail boxes' who emails have been returned due to not being valid, mailbox full, etc. and to all Soft phone customers; directing them to their web account to enter a 911 address for each line on their account. The voicemail is dependent on the new feature within web account; allowing the softphone customer to be able to enter and edit their 911 address.

Hello. Please listen to this important message regarding 911 Dialing that affects your Vonage phone service.

All VoIP operators are required by the FCC to provide 911 Dialing service to all of their customers. Since you have not provided us with your location information for 911 Dialing, on or around November 12 we will use your address on file to route your 911 calls. If you would like to change this address, simply login to your web account at www.vonage.com, select the Features link on your dashboard, and insert your correct street address information in the 911 Dialing feature box.

Please note that if you have multiple lines you must activate 911 Dialing for each line separately. 911 calls are routed based on your street address on file, so if you move your device you must re-register your new street address. Also, if you add a line to your account you will need to activate 911 Dialing for that line as well. Remember, you can easily update your street address at any time through your web account.

Thank you for working with us to ensure your safety and provide you with the best possible service. We do apologize for any inconvenience and thank you for your patience.

EXHIBIT 6

Introduction

This document describes the methods by which a Vonage customer can update their 911 address.

Overview

A Vonage customer can update their 911 address 2 ways:

- 1) **Web Account.** The customer logs into their personal web account and updates their 911 address.
- 2) **Customer Care Application (CCA).** The customer calls or emails a Vonage Care agent, and the agent uses CCA to update their customer's 911 address.

Background information

New Customers: New customers cannot get service without providing a 911 address.

Existing Customers: Existing customers without a 911 address have all been contacted via email, asking them to provide a 911 address. If they don't provide a 911 address, we will provision their 911 service using their billing or shipping address.

Definitions, Acronyms, and Abbreviations

Term	Definition
CCA	Customer Care Application. A web-based UI which provides Vonage customer care agents the ability to view and update a customer's service features
VPC	VoIP Positioning Center
Web Account	A web-based UI which provides Vonage customers the ability to view and update their service features

Process Description

Web Account

1. Customer uses a web browser to access their web account (<https://secure.vonage.com/webaccount/public/login.htm>).
2. Customer navigates to Edit 911 Dialing for a specific phone number
3. 911 Activation page is presented
4. Customer provides address information on activation page.
5. Customer clicks the 'Activate Now' button.
6. Address is validated (basic validation - no PO boxes, all required elements are present)
7. Customer Address is sent to VPC for provisioning
8. Response is received from VPC
9. Determine success/failure of provisioning.
10. Customer is notified of 911 status via email.

CCA

1. Customer contacts Vonage Customer Care via phone or email and requests that their 911 address be updated.
2. Care Agent uses CCA to access the 911 address for a specific phone number.
3. Care agent updates the 911 address and submits it for provisioning.
4. Customer Address is sent to VPC for provisioning
5. Response is received from VPC
6. Determine success/failure of provisioning.
7. Customer is notified of 911 status via email.

VERIFICATION

I, Louis Mamakos, state that I am Chief Technology Officer of Vonage Holdings Corp., the ultimate holding company of Vonage America Inc.; that I am authorized to submit this report on behalf of Vonage America Inc.; that the foregoing filing was prepared under my direction and supervision; and I declare under penalty of perjury that this report is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read 'Louis Mamakos', written over a horizontal line.

Name: Louis Mamakos
Title: Chief Technology Officer